

1. *Shields v. City of New York*, 150726/2018 – filed in the Supreme Court of the State of New York, settled for \$12,500 in 2018, without any admission of fault or liability by the defendants.

In the cases that settled, a stipulation of settlement and order of dismissal with prejudice was filed with the respective court, indicating, in sum and substance, that nothing in the settlement shall be construed as an admission or concession of liability by any of the defendants or the City of New York regarding any of the allegations made by the plaintiffs in their complaints, or that any of the plaintiffs' rights under the Federal or New York Constitutions or Statutes had been violated.

A review of the officer's Central Personnel Index (CPI) revealed the following:

1. On March 25, 2009, Officer Trabolse had a substantiated departmental investigation for being found outside of his residence while on sick leave, without authorization. He forfeited 5 vacation days.
2. On December 19, 2011, Officer Trabolse had a substantiated departmental investigation for failure to appear in traffic court. HE was issued a command discipline.

A review of the officer's CCRB history revealed the following:

1. On August 20, 2013, Officer Trabolse had a substantiated CCRB complaint for Abuse in the stop, frisk, and search of an individual. He received a command discipline and formalized training.
2. On November 12, 2014, Officer Trabolse had a substantiated CCRB complaint for abuse in a vehicle search. He received a command discipline.
3. On October 1, 2018, Officer Trabolse had a substantiated CCRB complaint for use of force-nonlethal restraining device and use of physical force, as well as abuse in the entry of a premises and threat to damage/seize property.

The People reserve the right to move *in limine* to preclude reference to this information, or otherwise to object to its use or introduction into evidence during trial.

Should you wish to discuss this matter, please do not hesitate to call me at [REDACTED] [REDACTED] Ext.] during office hours.

Sincerely,

[REDACTED]
[REDACTED]